

CRIMINAL DOCKET # 03-10367-MEL

UNITED STATES OF AMERICA
vs.
JAMES T. RICHARDS

MOTION FOR PRODUCTION
OF DOCUMENTS

Now comes defendant and hereby requests that this Honorable Court order the Justice Department, The FBI, ~~and~~ the Dept. of Homeland Security, The Secret Service, and the employee and contracting agents thereof to produce to the defendant copies of all documents, original or otherwise, or copies of faxes or emails or any other reproduction of textual content from any source whatsoever which were authored by, or appear to have been authored by, or which a reasonable person might reasonably believe or suspect were authored by, the defendant, James T. Richards, DOB 2/26/64, SSN 022-44-6887, during the period November 1st, 2001 to January 30, 2002 and which are in the possession or which at any time come into the possession of the Justice Dept., and/or the FBI and/or the Dept. of Homeland Security and/or Secret Service and/or (any of their employees) and/or contracting agent(s) and/or into the possession of any other law enforcement agency, media organization, private corporation and/or other business entity or any employee(s) thereof and/or any private individual and/or anyone else whomsoever of whom the Justice Dept., FBI,

USA vs. JAMES T. RICHARDS

MOTION FOR PRODUCTION OF DOCUMENTS

Dept. of Homeland Security or Secret Service and/or any
of ~~their~~ employee(s) or contracting agent(s) ~~are~~ aware,
or which are currently or were at any time in the
possession of any federal or state agency, department,
bureau or any other governmental organization or any
employee(s) or contracting agent(s) thereof, or any
foreign entity or organization or anyone else whomsoever
of which the Justice Dept., FBI, Dept. of Homeland
Security, Secret Service and/or any employee(s) or
contracting agents ^{that the prosecution produce} thereof ^{concerning} ~~is~~ aware, and ^{any note(s)} [&] said documents
which were made by the Justice Dept., FBI, Dept. of
Homeland Security and/or Secret Service and/or any employee(s)
or contracting agent(s) thereof. In addition, defendant
requests production of all documents from any source
whatsoever which the prosecution intends to use at trial
which are not privileged, including all medical
reports and documents concerning defendant, and
also including all medical reports and documents concerning
defendant which are in the possession of the prosecution
^{prosecution} even if they will not be using said documents at
trial, and without regard to when the reports or documents
were issued or authored.

Finally, defendant requests that the prosecution
produce any and all documents which Prosecutor George
Toscas himself would want if he were in defendant's
position and which ^{are} not protected by privilege,

U.S.A. vs. James T. RICHARDS
MOTION FOR PRODUCTION OF DOCUMENTS

and/or which the judge ruling on this would want if he/she was in defendant's position and which were legally discoverable documents.

Respectfully submitted,

DATE: April 5, 2004

James T. Richards

James T. Richards, # 36350

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